



# **Privacy Impact Assessment**

## **Radiation Safety Management System (RSMS)**

*Departmental Management*

*Revision: 2.0*

*Date: February 2010*



## Document Information

Owner Details	
Name	John Jensen
Contact Number	301-504-2440
E-mail Address	<a href="mailto:John.Jensen@da.usda.gov">John.Jensen@da.usda.gov</a>

Revision History			
Revision	Date	Author	Comments
1	September 2008	Katina A Jones	Initial Draft
2	February 2010	OSS/ FuGEN	Draft Update

Distribution List			
Name	Title	Agency/Office	Contact Information
John Jensen	System Owner	Radiation Safety Division	301-504-2440
Katina Jones	System Administrator	Radiation Safety Division	301-504-2444



## Table of Contents

<b>DOCUMENT INFORMATION .....</b>	<b>II</b>
<b>TABLE OF CONTENTS .....</b>	<b>III</b>
<b>1     SYSTEM INFORMATION .....</b>	<b>1</b>
<b>2     DATA INFORMATION .....</b>	<b>2</b>
2.1   Data Collection .....	2
2.2   Data Use .....	3
2.3   Data Retention .....	4
2.4   Data Sharing .....	4
2.5   Data Access .....	5
2.6   Customer Protection .....	5
<b>3     SYSTEM OF RECORD .....</b>	<b>6</b>
<b>4     TECHNOLOGY .....</b>	<b>7</b>
<b>5     COMPLETION INSTRUCTIONS .....</b>	<b>8</b>



# 1 System Information

System Information	
Agency:	Departmental Administration
System Name:	Radiation Safety Management System (RSMS)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	Online, web-based database management system that manages radiation records, information, communications and guidance material
Who owns this system? (Name, agency, contact information)	John Jensen, Director, Radiation Safety Staff Departmental Administration 301-504-2440 <a href="mailto:John.jensen@da.usda.gov">John.jensen@da.usda.gov</a>
Who is the security contact for this system? (Name, agency, contact information)	Katina Jones, Permit Analyst, Radiation Safety Staff Departmental Administration 301-504-2444 <a href="mailto:Katina.jones@da.usda.gov">Katina.jones@da.usda.gov</a>
Who completed this document? (Name, agency, contact information)	Katina Jones, Permit Analyst, Radiation Safety Staff Departmental Administration 301-504-2444 <a href="mailto:Katina.jones@da.usda.gov">Katina.jones@da.usda.gov</a>



## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Records, information, communications and guidance related to radiation usage within USDA
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	Sections 81 and 161b of the Atomic Energy Act of 1954, as amended; Tiel 10 CRF, Part 20; and Departmental Policy
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	USDA employees
4.1	What data is being collected from the customer?	Date of birth, social security number, address, education, location of radioactive sources, type of radioactive sources
4.2	What USDA agencies are providing data for use in the system?	AMS, APHIS, ARS, DA, FS, FSIS, NRCS
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	None
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	



## 2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	To evaluate an individual's qualification incident to the approval to obtain and use radioactive materials.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Routine usage of the data is for the purpose of managing a safe and effective radiation protection program
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Social security numbers are encrypted, access to the system is only granted after an application for a permit is reviewed and approved



No.	Question	Response
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

## 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	The retention period varies depending on the data type, for ex: survey records are archived after 3 years
14.2	What are the procedures for purging the data at the end of the retention period?	There are currently no procedures in place to purge RSMS data. The retention period for various data elements differs: Lab Surveys: 3 years Leak Tests: 5 years Disposal of Material: Indefinite The system has not been populated with enough data to effectively purge anything at this point.
14.3	Where are these procedures documented?	There is no documentation for purging data but the retention guidelines are available on the RSD website and within the RSD safety handbook.
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The data is reviewed daily by the Radiation Safety Staff in different capacities. For ex: the Program Analysts review survey records while the Director is reviews inspection reports.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	For purposes of inspection to ensure compliance with the license



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	Management of the other agency, in this case, the Nuclear Regulatory Commission (NRC)
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	The system is accessible via the internet; security protocols are in place.

## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Users (USDA employees), system administrators (RSS), developers (SI International)
21	How will user access to the data be determined?	By userids issued by the RSS
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	By denying access or selecting specific user types with defined security levels
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 2.6 Customer Protection

No.	Question	Response
-----	----------	----------





No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	The Radiation Safety Division will be responsible for protecting the privacy rights of customers and employees. Several initiatives are in place to ensure this: annual privacy training, encryption of data; and user ids and passwords are only issued after confirmation is made by RSD that the requestor is a USDA employee that has a need for radioactive material.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	The banner screen has a privacy act notification as well as a phone number and email address to contact our office.
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input type="checkbox"/> Yes – If YES, go to question 27. <input checked="" type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	TBD
27	Consider the following: <ul style="list-style-type: none"><li>Consolidation and linkage of files and systems</li><li>Derivation of data</li><li>Accelerated information processing and decision making</li><li>Use of new technologies</li></ul> Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	RSMS personnel will process information requests in the order they are received, and based on the justification for the information, so as to prevent any special or preferential treatment.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 30
29.1	Explain	The security level for userids is different based on the needs of the individual or group.

### 3 System of Record

No.	Question	Response
-----	----------	----------



No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	The identifying attribute is the userid
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.gpo.gov">www.access.gpo.gov</a> .)	42 U.S.C. 2111 and 42 U.S.C. 2201(b)
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



## 5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**1. Yes.**

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF  
INFORMATION OFFICE FOR CYBER SECURITY.



## Privacy Impact Assessment Authorization

### Memorandum

I have carefully assessed the Privacy Impact Assessment for the

---

(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

---

System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

---

Date

---

Agency's Chief FOIA officer  
OR Senior Official for Privacy  
OR Designated privacy person

---

Date

---

Agency OCIO

---

Date